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May 15, 2025

**VIA ECF**

Hon. Edgardo Ramos  
 U.S. District Court for the Southern District of New York  
 40 Foley Square  
 Courtroom 619  
 New York, NY 10007

**Re: *Brous v. Eligo Energy, LLC*, 24 Civ. 1260**  
**Joint Letter Motion for Extension of Time for All Remaining Deadlines**

Dear Judge Ramos:

Pursuant to Rule 1.E of Your Honor's Individual Practices, the parties hereby request an extension of time for the remaining deadlines set forth in the February 6, 2025 Civil Case Discovery Plan and Scheduling Order. (ECF No. 163.) The proposed revised civil case discovery plan and scheduling order is attached as Exhibit A. The following is the list of the original deadlines and requested new deadlines:

Event	Current Deadline	Proposed Deadline
Deadline for completing non-expert depositions	May 23, 2025	June 20, 2025
Deadline to serve further interrogatories, including expert interrogatories	August 22, 2025	September 19, 2025
Deadline for serving expert reports	June 27, 2025	July 25, 2025
Deadline for serving rebuttal expert reports	August 1, 2025	September 12, 2025
Deadline for completing expert depositions	September 19, 2025	October 17, 2025
Deadline for completing all discovery	September 19, 2025	October 17, 2025
Deadline for serving moving papers for class certification	September 12, 2025	October 10, 2025
Deadline for answering papers to motion for class certification	October 17, 2025	November 21, 2025
Deadline for reply papers to motion for class certification	October 31, 2025	December 12, 2025

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Good cause exists for this request. The parties require an extension of the deadlines in the scheduling order to accommodate ongoing discovery, including the approximately 10 fact depositions over the coming weeks, Defendants' production of class-wide customer data, and ongoing conferrals about discovery issues. This is the parties' second request to revise the scheduling order.

Respectfully,

/s/ Ryan Watstein

Ryan Watstein